

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Southwest Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

Consolidated Glass & Mirror Corporation
305 Lineberry Road - Galax, Virginia
Permit No. SWRO11015

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Consolidated Glass & Mirror Corporation has applied for a Title V Operating Permit for its Plant No. 1 facility located at 305 Lineberry Road in Galax, Virginia. The Department has reviewed the application and has prepared a Title V Operating Permit.

Permit Contact: _____ Date: _____
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Air Permit Manager: _____ Date: _____
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Regional Director: _____ Date: _____
Dallas R. Sizemore

FACILITY INFORMATION

Permittee

Consolidated Glass & Mirror Corporation
Plant No. 1
305 Lineberry Road
P.O. Box 389
Galax, VA 24333
NET Facility No. 51-640-00060

SOURCE DESCRIPTION

NAICS 327215 – Glass Product Manufacturing Made of Purchased Glass (SIC 3231)

Consolidated Glass & Mirror Corporation (CG&M) manufactures mirrors and other liquid coatings glass products at their Plant No. 1 facility located at 305 Lineberry Road, Galax, Carroll County, Virginia. In conventional mirror production, large sheets of glass are loaded onto the silver line where they are transformed into mirrors on a continuous conveyor line. The glass sheets are cleaned by automated rotating brushes and tap water. The surface of the glass is lightly etched with cerium oxide and rinsed with deionized water. The cerium oxide roughens the surface of the glass and improves chemical adhesion. A tin sensitizer solution is applied just prior to the silver solution to chemically bond the reflective silver to the glass. A copper solution is then applied to improve the adhesion of the mirror backing paint (applied in a later step) to the reflective coating surface. The mirrors are again rinsed with deionized water and then heated in an electric oven. The mirrors then pass through a continuously flowing curtain of paint at the curtain coater. This backing paint is applied over the reflective metals to protect them from environmental conditions (moisture). The viscosity of the backing paint is constantly monitored and additional solvent is added as needed. The mirror backing paint application process is responsible for the majority of the VOC emissions from the facility.

After exiting the curtain coater, the mirrors are dried in a series of infrared ovens that enclose a section of the conveyor line. The mirrors are allowed to cool slightly before entering the rotogravure, which applies an ultra-violet (UV) coating over the backing paint to protect and improve its durability. UV light is used to cure the coating. The mirrors are then unloaded from the conveyor line and inspected for flaws. The mirrors may then be sent directly to shipping or to any of the various cutting, grinding, beveling, and/or framing operations at the facility. Solar panel (non-reflective) and window glass (UV) manufacturing operations were added in 2006. Multi-coat curtain coater lines 2, 3, and 4 were added in 2010 and 2011.

The facility is a Title V major source of VOCs. This source is located in an attainment area for all criteria pollutants. The facility is currently permitted under a minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011).

Compliance Assurance Monitoring (CAM) requirements (40 CFR 64) are not applicable to Emission Unit I.D. Nos. 1.A, 1.B, 2, and 3 at this facility since there are no pollution control devices associated with the emission units. CAM requirements are applicable to multi-coat curtain coater lines 2, 3, and 4 (Unit I.D. No. 4).

The list of insignificant activities in the Title V application includes several processes that have no emissions associated with them. These operations include: plant wastewater pH control, which utilizes sulfuric acid and caustic soda; ammonia scrubber cleaning with acetic acid; various wet glass cutting and polishing operations (slitters, seam belts, radius corners, drilling, pattern V-groove, master edge, hand cutting, pattern beveling, pattern polisher, hand edging, and felt wheel); glass cleaning and etching with cerium oxide; glass/mirror cutting head coolant pH adjustment with boric acid; wastewater treatment; product packaging (cartoning); and shipping.

COMPLIANCE STATUS

The facility is inspected at least once each year and the last formal inspection was conducted on August 22, 2011. The source was found to be in compliance with all applicable requirements.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Curtain Coater Unit ID Nos. 1A, 2, 3, and 4 - The mirrors pass through a continuously flowing curtain of paint, which is applied over the reflective silver surface of the mirror. Thinners are added to the paint to maintain its viscosity at the desired level. Volatile pollutants are emitted from exhausts in the curtain coater room, between the curtain coater and the infrared drying ovens, and inside the infrared drying ovens. Curtain coater line 1A is limited to 123.61 lb/hr and 100.00 tons/year of VOC emissions. Curtain coater lines 2, 3, and 4 are limited to a total of 23.05 lb/hr and 60.76 tons/yr of VOC emissions. There are no add-on pollution control devices on the curtain coater line 1A or silver lines. Curtain coater lines 2, 3, and 4 have a regenerative thermal oxidizer (RTO) for control of VOC emissions. Multi-coat curtain coater lines 2, 3, and 4 utilize the same application process as curtain coater line 1A, except that curtain coater lines 3 and 4 add a second and third coat of paint for improved protection from the environment. Multi-coat curtain coater lines 2, 3, and 4 were added in 2010 and 2011.

Rotogravure - Applies a UV paint over the mirror backing paint. VOC emissions from the rotogravure paint application are limited to 8.25 tons/year, based on a consumption limit of 75.0 tons/yr. The facility normally uses a UV paint with less than 0.1% VOC and resulting annual emissions are less than 0.1 T/yr. There are no VOC control devices on the rotogravure exhaust.

Solar Panel (non-reflective) and UV Window Operations – An anti-reflective coating for photovoltaic superstrates (solar modules) and a temperable UV absorbing coating for residential and commercial glazing (window) applications were added at Plant 1 in 2006. No new production equipment or emission points were added as a result of this change.

Glass Cutting (Bystronics) - Mineral spirits is sometimes used as a lubricant in the glass cutting operations. For permitting purposes, 100% of the lubricant may potentially be released into the atmosphere as VOC. VOC emissions from glass cutting operations are limited to 5.0 tons/year. There is no exhaust or control device on the glass cutting operations.

Glass Grinding & Beveling – CG&M may use glass grinding coolants that contain up to 10% VOC by weight. A batch of coolant solution is typically comprised of 40,000 gallons of water and 400 gallons of coolant. The coolant solution is pumped to the grinding and beveling machines and circulated back to the storage tank 24 hours/day, 5 days/week. After the coolant solution

has been in use for a period of 4 weeks, it is replaced with a new batch. Annual emissions from the glass grinding and beveling operations are limited to 8.0 tons of VOC.

EMISSIONS INVENTORY

The 2010 annual emissions are summarized in the following table:

Emission Unit	2010 Criteria Pollutant Emissions (Tons/Year)				
	VOC	CO	SO ₂	PM ₁₀	NO _x
Curtain Coater 1A	0.61	n/a	n/a	n/a	n/a
Curtain Coater 2,3,4	0	-	-	-	-
Glass Cutting	0	-	-	-	-
Rotogravure	0	-	-	-	-
Glass grinding/beveling	0	-	-	-	-
Total	0.61	-	-	-	-

EMISSION UNIT APPLICABLE REQUIREMENTS

Curtain Coater (Unit ID No. 1.A)

Limitations:

The following limitations are State BACT requirements from Conditions 5, 7, and 11 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011):

- Condition 5, limiting curtain coater mirror back paint consumption to 88.23 pounds per hour and 98.87 tons per year.
- Condition 5, limiting consumption of n-butyl acetate reducer (or equivalent) in the curtain coater mirror back painting operation to 22.47 pounds per hour and 24.82 tons per year.
- Condition 5, limiting consumption of Guardian AR Coating, or equivalent, to 20.0 pounds per hour and 5.0 tons per year.
- Condition 5, limiting consumption of Red Spot Guardian Galax CC coating , or equivalent, to 88.23 pounds per hour and 810 pounds per year.
- Condition 5, limiting consumption of n-Propanol Reducer , or equivalent, to 104.6 pounds per hour and 26.15 tons per year.
- Condition 7, limiting consumption of n-propanol, or equivalent cleaning solvent, to 5.0 tons per year.
- Condition 11, limiting annual VOC emissions to 123.61 pounds per hour and 100.00 tons per year.

Monitoring & Recordkeeping:

As required in Condition 17 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011), CG&M will monitor and record on a monthly basis, the weight of mirror backing paint and reducer consumed, and the VOC throughput. Hourly, monthly and annual pollutant emissions will be calculated and recorded. Hourly emissions will be calculated by dividing monthly emissions by monthly hours of operation.

Testing:

The permit does not require source testing for Unit I.D. No. 1A. The Department and EPA have authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 19 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011) requires that CG&M notify DEQ within four (4) hours after discovery of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, CG&M shall provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Compliance with the curtain coater emission limits listed in Condition 11 of the NSR permit issued February 2, 2011 (as amended August 19, 2011), will be demonstrated through emission calculations. These emission calculations will be based on 100% of the volatile pollutants in the mirror backing paint (as applied) being emitted to the atmosphere. The VOC content of each paint and reducer (per the product MSDS) multiplied by the corresponding quantity of each coating applied, will be used to determine the corresponding monthly emissions of VOC from the curtain coater. Hourly emissions will be determined by dividing the monthly emissions by the hours of curtain coater operation.

Streamlined Requirements:

There are no streamlined requirements for the curtain coater mirror back painting operation.

Rotogravure UV Coating Process (Unit I.D. 1B)

Limitations:

The following limitations are State BACT requirements from Conditions 8 and 13 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011):

- Condition 8, limiting rotogravure coating consumption to 25 pounds per hour and 75 tons per year.
- Condition 13 limiting annual VOC emissions from the rotogravure coating process to 2.75 pounds per hour and 8.25 tons per year.

Monitoring & Recordkeeping:

As required in Condition 17 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011), CG&M will monitor and record on a monthly basis, the weight of coatings consumed in the rotogravure and the VOC throughput. Hourly, monthly and annual VOC emissions will be calculated and recorded. Hourly VOC emissions will be calculated by dividing monthly emissions by monthly hours of operation.

Testing:

The permit does not require source testing for Unit I.D. No. 1B. The Department and EPA have authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 19 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011) requires that CG&M notify DEQ within four (4) hours after discovery of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, CG&M shall provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Compliance with the rotogravure UV coating process VOC emission limits listed in Condition 13 of the NSR permit issued February 2, 2011 (as amended August 19, 2011), will be demonstrated through emission calculations. These emission calculations will be based on 100% of the VOC in the UV coating being emitted to the atmosphere. The VOC content of each coating (per the product MSDS) multiplied by the corresponding quantity of that coating applied will be used to determine the monthly VOC emissions from the rotogravure. Hourly emissions will be determined by dividing the monthly VOC total by the hours of rotogravure operation.

Streamlined Requirements:

There are no streamlined requirements for the rotogravure UV coating application operation.

Glass Cutting Operations (Unit I.D. No. 2)**Limitations:**

The following limitations are State BACT requirements from Conditions 9 and 14 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011):

- Condition 9, limiting mineral spirits (or equivalent volatile lubricant) consumption to 32.0 pounds per hour and 5.0 tons per year.
- Condition 14 limiting annual VOC emissions from the glass cutting operations to 32.00 pounds per hour and 5.00 tons per year.

Monitoring & Recordkeeping:

As required in Condition 17 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011), CG&M will monitor and record on a monthly basis, the consumption of glass cutting lubricant. Hourly consumption will be calculated by dividing monthly consumption by monthly hours of operation.

Testing:

The permit does not require source testing for Unit I.D. No. 2. The Department and EPA have authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 19 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011) requires that CG&M notify DEQ within four (4) hours after discovery of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, CG&M shall

provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Compliance with the glass cutting lubricant VOC emission limits listed in Condition 14 of the NSR permit issued February 2, 2011 (as amended August 19, 2011), will be demonstrated through emission calculations. These emission calculations will be based on 100% of the VOC in the lubricant (mineral spirits or equivalent) being emitted to the atmosphere. The VOC content of each lubricant (per the product MSDS) multiplied by the corresponding quantity of that lubricant consumed will be used to determine the monthly VOC emissions from glass cutting. Hourly emissions will be determined by dividing the monthly VOC total by the hours of unit operation.

Streamlined Requirements:

There are no streamlined requirements for the glass cutting operations.

Glass Grinding & Beveling Coolant (Unit I.D. No. 3)

Limitations:

The following limitations are State BACT requirements from Conditions 10 and 15 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011):

- Condition 10, limiting Quaker Microcut 106-C (or equivalent coolant) consumption to 13.9 pounds per hour and 80.0 tons per year.
- Condition 15, limiting emissions from the circulation and use of the glass grinding & beveling coolant to 1.39 lbs/hr and 8.00 tons/yr of VOC.

Monitoring & Recordkeeping:

As required in Condition 17 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011), CG&M will monitor and record on a monthly basis, the consumption of glass grinding coolant emissions from the glass grinding & beveling coolant. Hourly consumption and emissions will be calculated by dividing monthly totals by monthly hours of operation.

Testing:

The permit does not require source testing for Unit I.D. No. 3. The Department and EPA have authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 19 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011) requires that CG&M notify DEQ within four (4) hours after discovery of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, CG&M shall provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Compliance with the glass grinding coolant pollutant emission limits listed in Condition 15 of the NSR permit issued February 2, 2011 (as amended August 19, 2011), will be demonstrated through emission calculations. These emission calculations will be based on 100% of the volatile pollutants in the coolant being emitted to the atmosphere. The VOC content of each lubricant (per the product MSDS) multiplied by the corresponding quantity of that lubricant consumed, will be used to determine the corresponding monthly emissions of this pollutant from

the glass grinding coolant. Hourly emissions will be determined by dividing the monthly emissions by the hours of unit operation.

Streamlined Requirements:

There are no streamlined requirements for the glass grinding coolant operations.

Multi-Coat Curtain Coater Lines 2, 3, and 4 (Unit ID No. 4)

Limitations:

The following limitations are State BACT requirements from Conditions 2, 3, 4, 6, and 12 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011):

- Condition 2, controlling volatile organic compounds emissions from the curtain coater lines 2, 3, and 4 by the use of a regenerative thermal oxidizer (RTO), or equivalent.
- Condition 3, the RTO for curtain coater lines 2, 3, and 4 shall provide a control efficiency for VOCs of not less than 98% on a mass basis.
- Condition 4, the enclosures to the curtain coater lines 2, 3, and 4 shall provide an overall VOC capture efficiency of not less than 90% on a mass basis.
- Condition 6, limiting curtain coater mirror back paint consumption to 360.3 pounds per hour and 950 tons per year.
- Condition 6, limiting consumption of Sunoco Xylene Reducer (Product Code 430500), or equivalent, to 58.08 pounds per hour and 153 tons per year.
- Condition 12, limiting annual VOC emissions to 23.05 pounds per hour and 60.76 tons per year.

Monitoring & Recordkeeping:

As required in Condition 17 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011), CG&M will monitor and record on a monthly basis, the weight of mirror backing paint and reducer consumed, and the VOC throughput. Hourly, monthly and annual pollutant emissions will be calculated and recorded. Hourly emissions will be calculated by dividing monthly emissions by monthly hours of operation.

The facility is a major source subject to Title V permitting; the multi-coat curtain coater lines 2, 3, and 4 (Unit I.D. No. 4) are subject to 40 CFR Part 64 - Compliance Assurance Monitoring (CAM). An emission unit is subject to CAM if it meets all of the following criteria on a pollutant-by-pollutant basis:

- a. Emits or has the potential to emit uncontrolled quantities of one or more regulated air pollutants at or above major source levels,
- b. Is subject to one or more emissions limitations for the regulated air pollutants for which it is major before control, and
- c. Uses an add-on control device to achieve compliance with the emissions limitations.

The multi-coat curtain coater lines 2, 3, and 4 (Unit I.D. No. 4) are emission units that meet all of the above criteria as follows:

- a. The units emit uncontrolled quantities of VOCs above major source levels.
- b. The units are subject to emissions limits for VOCs.
- c. The units use a regenerative thermal oxidizer (RTO) to comply with the limit on VOCs.

The permittee uses thermocouples as a temperature indicator for the RTO. The permittee will be required to monitor, operate, calibrate and maintain the RTO or control device according to the CAM plan in Section VII.C. of the Title V permit.

Recordkeeping requirements associated with the CAM and periodic monitoring are as stated in the Title V permit.

Testing:

The permit requires initial source testing for the multi-coat curtain coater lines 2, 3, and 4 (Unit I.D. No. 4) following startup. The Department and EPA have authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 19 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011) requires that CG&M notify DEQ within four (4) hours after discovery of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, CG&M shall provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Compliance with the multi-coat curtain coater emission limits listed in Condition 12 of the NSR permit issued February 2, 2011 (as amended August 19, 2011), will be demonstrated through emission calculations. These emission calculations will be based on 100% of the volatile pollutants in the mirror backing paint (as applied) being emitted to the atmosphere. The VOC content of each paint and reducer (per the product MSDS) will be multiplied by the corresponding quantity of each coating applied; this quantity will then be multiplied by the VOC control efficiency of the RTO and the VOC capture efficiency of the enclosures (per Conditions 3 and 4 of the NSR Permit dated February 2, 2011 (as amended August 19, 2011)). This final quantity will be used to determine the corresponding monthly emissions of VOCs from the curtain coater. Hourly emissions will be determined by dividing the monthly emissions by the hours of curtain coater operation.

Streamlined Requirements:

There are no streamlined requirements for the curtain coater lines 2, 3, and 4.

FACILITY-WIDE REQUIREMENTS

Testing:

The permit does not require facility-wide source testing. The Department and EPA have authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 19 of the Minor NSR Permit issued on February 2, 2011 (as amended August 19, 2011) requires that the permittee notify the DEQ Director within four business hours after discovery if the permitted facility or related air pollution control equipment causes excess emissions for more than one hour. The owner must provide a written statement within 14 days explaining the problem, corrective actions taken, and the estimated duration of the malfunction.

Streamlined Requirements:

There are no facility-wide streamlined requirements.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

STATE-ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Code have specific requirements only enforceable by the State and have not been included in the Federal Operating Permit (unless included previously in a federally enforceable permit):

- 9 VAC 5-40-340, Standard for odor;
- 9 VAC 5-60-300, Standard for Toxic Pollutants; and
- 9 VAC 5-40-350, Standard for Toxic Pollutants.

FUTURE APPLICABLE REQUIREMENTS

There are no known future applicable requirements for this facility.

INAPPLICABLE REQUIREMENTS

The following are not applicable to this facility:

9 VAC 5-40-300, Standard for Volatile Organic Compounds

9 VAC 5-40-310, Standard for Nitrogen Oxides

40 CFR 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters)

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting will be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
21	Floor Patch	9 VAC 5-80-720 A7	none	20 gal/yr
22, 47	Silver Nitrate Solution (mirror plating process)	9 VAC 5-80-720 B	none	4200 gal/yr
23	Sodium Hydroxide Solution (mirror plating process)	9 VAC 5-80-720 B	none	4200 gal/yr
24	Tin Sensitizer Solution (mirror plating process)	9 VAC 5-80-720 B2	HCl	120 gal/yr
25	Ventilation for Wheel Dressing Machine Room	9 VAC 5-80-720 B	none	-
26	UV Cleanup	9 VAC 5-80-720 B	VOC	440 gal/yr
27	Sulfuric Acid (pH control for wastewater treatment and mixing copper sulfate solution for silverline)	9 VAC 5-80-720 B	none	2750 gal/yr
28	Muriatic Acid (regeneration of deionizers and cleaning filter cloths in filter press)	9 VAC 5-80-720 B6	HCl (31.5%) (none emitted)	4950 gal/yr
29	Caustic Soda (Wastewater pH)	9 VAC 5-80-720 B	none	7920 gal/yr
30	Acetic Acid (Ammonia Scrubber Cleaning)	9 VAC 5-80-720 B	none	3 gal/yr
31 32 34	<u>Drilling & Shaping:</u> - Slitters - Finger Pull - Seam Belt	9 VAC 5-80-720 B	none	-
35	Vinyl Backing	9 VAC 5-80-720 B	none	720,000 ft/yr
36	Boric Acid (Adjust Coolant Pit pH)	9 VAC 5-80-720 B	none	9000 lbs/yr
37	Defoamer (Coolant Pit and Wastewater Treatment)	9 VAC 5-80-720 B2	VOC	60 gal/yr
38	Soap for Washers	9 VAC 5-80-720 B	none	55 gal/yr
39	Face-Down Stripper (Mirror Cleaning)	9 VAC 5-80-720 B	none	4875 gal/yr
40	Nitric Acid (Silver Line Cleaning)	9 VAC 5-80-720 B	none	300 gal/yr
41	Parts Washer	9 VAC 5-80-720 B2	VOC	250 gal/yr
42	Propane-Fired Space Heaters and Water Heaters	9 VAC 5-80-720 B	VOC, NO _x , CO	91,000 gal/yr

Emission Unit No.	Emission Unit Description	Citation	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
43, 48	Copper Sulfate Pentahydrate (Mirror Plating)	9 VAC 5-80-720 B	none	5800 lbs/yr
44	Sugar Solution (Mirror Plating)	9 VAC 5-80-720 B	none	4200 gal/yr
45	Cerium Oxide (Glass Cleaning/Polishing/Etching)	9 VAC 5-80-720 B	none	20 tons/yr
46	Hydraulic Oil	9 VAC 5-80-720 B	VOC	-
47	Silver Exhaust	9 VAC 5-80-720B	None	-
48	Copper Exhaust	9 VAC 5-80-720B	None	-
49	Wastewater treatment	9 VAC 5-80-720B	-	-

The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are available for public review.

PUBLIC PARTICIPATION

A public notice appeared in the *Galax Gazette* on December 14, 2011, announcing a 30-day public comment period for this permit. This public notice will be a concurrent review with the EPA for both the draft and the proposed permit. The public comment period extended until January 17, 2012. Notice was also provided to North Carolina, Tennessee, and West Virginia as affected states. No comments were received.